

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

LA UNIÓN DEL PUEBLO ENTERO, <i>et al.</i> , <i>Plaintiffs,</i>	§ § § § § § §	Case No. 5:21-cv-844-XR
v.		
GREGORY W. ABBOTT, <i>et al.</i> , <i>Defendants.</i>		

OCA-GREATER HOUSTON, <i>et al.</i> , <i>Plaintiffs,</i>	§ § § § § § §	Case No. 1:21-cv-780-XR
v.		
JANE NELSON, <i>et al.</i> , <i>Defendants.</i>		

HOUSTON AREA URBAN LEAGUE, <i>et al.</i> , <i>Plaintiffs,</i>	§ § § § § § §	Case No. 5:21-cv-848-XR
v.		
GREGORY WAYNE ABBOTT, <i>et al.</i> , <i>Defendants.</i>		

LULAC TEXAS, <i>et al.</i> , <i>Plaintiffs,</i>	§ § § § § § §	Case No. 1:21-cv-0786-XR
v.		
JANE NELSON, <i>et al.</i> , <i>Defendants.</i>		

MI FAMILIA VOTA, <i>et al.</i> , <i>Plaintiffs,</i>	§ § § § § § §	Case No. 5:21-cv-0920-XR
v.		
GREG ABBOTT, <i>et al.</i> , <i>Defendants.</i>		

UNITED STATES OF AMERICA,
Plaintiff,

v.

THE STATE OF TEXAS, ET AL.,
Defendants

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Case No. 5:21-cv-1085-XR

STATE DEFENDANTS' PRETRIAL DISCLOSURES

Defendants Gregory W. Abbott, in his official capacity as Governor of Texas, Jane Nelson, in her official capacity as Secretary of State, Angela Colmenero, in her official capacity as Provisional Attorney General of Texas, and the State of Texas ("State Defendants"), provide their Pretrial Disclosures in accordance with Federal Rule of Civil Procedure 26(a)(3) and the Scheduling Order entered by this Court.

WITNESSES

Defendants identify the following witnesses in accordance with Federal Rule of Civil Procedure 26(a)(3)(A)(i):

WITNESS	EXPECTS TO CALL OR MAY CALL
Keith Ingram	Expects to Call
Christina Adkins	Expects to Call
Jacqueline Hagan Doyer	Expects to Call
Jonathan White	Expects to Call
Frank Phillips	Expects to Call
Mark Hoekstra	Expects to Call
Stephen C. Graves	Expects to Call
Jacquelyn Callanen	Expects to Call
Bridgette Escobedo	Expects to Call
Kristi Hart	May Call
Samuel M. Taylor	May Call
Sheri Gipson	May Call
Hilda Ann Salinas	May Call
Yvonne Ramón	May Call
Lisa Wise	May Call
Michael Scarpello	May Call
Tacoma Phillips	May Call

Rivelino Lopez	May Call
Jennifer Colvin	May Call
Lauren Smith	May Call
Rachelle Obakozuma	May Call
Charlie Johnson	May Call
Dan Haynes	May Call
Dana Debeavoir	May Call

TESTIMONY BY DEPOSITION

Defendants identify the following witnesses whose testimony State Defendants expect to present by deposition in accordance with Federal Rule of Civil Procedure 26(a)(3)(A)(ii):

WITNESS	DATE(S) OF DEPOSITION	DESIGNATIONS
Chris Hollins	May 6, 2022	<i>See Exhibit A</i>
Yvonne Ramón	April 21, 2022 May 10, 2022	<i>See Exhibit B</i>
Isabel Longoriga	April 20, 2022 April 22, 2022	<i>See Exhibit C</i>

EXHIBITS

Defendants identify the following documents or other exhibits which Defendants expect to offer, and which may be offered, in accordance with Federal Rule of Civil Procedure 26(a)(3)(A)(iii):

Will Offer

STATE DEFENDANTS' EXHIBIT NO.	DESCRIPTION	DATE EXHIBIT IDENTIFIED	ADMITTED OR WITHDRAWN
1	Signed and executed copy Senate Bill 1. https://webservices.sos.state.tx.us/legbills/files/C287/SB1.pdf .	July 28, 2023	
2	Expert Witness Report, Prof. Mark Hoekstra, <i>Response to Prof. Eitan Hersh's February 10, 2023, Second Supplemental Report</i> . (Served on Mar. 3, 2023)	July 28, 2023	
3	Expert Witness Report, Prof. Mark Hoekstra, <i>Response to Prof. Eitan Hersh's February 28, 2022, Initial Report</i> . (Served on Mar. 29, 2022).	July 28, 2023	
4	Notice of Correction to March 29, 2022, Expert Report of Prof. Mark Hoekstra, Ph.D., Written in Response to the February 28, 2022, Report by Prof. Eitan Hersh.	July 28, 2023	

	(Served on Apr. 25, 2023).		
5	Expert Witness Report, Prof. Mark Hoekstra, <i>Response to Prof. Christian Grose's February 10, 2023, Supplemental Report.</i> (Served on Mar. 3, 2023)	July 28, 2023	
6	Expert Witness Report, Prof. Mark Hoekstra, <i>Response to Prof. Christian Grose's February 28, 2022, Initial Report.</i> (Served on Mar. 29, 2022).	July 28, 2023	
7	Notice of Correction to March 29, 2022, Expert Report of Prof. Mark Hoekstra, Written in Response to the February 28, 2022, Report by Prof. Christian Grose. (Served on Apr. 25, 2023).	July 28, 2023	
8	Expert Witness Report, Prof. Mark Hoekstra, <i>Response to Prof. Eric McDaniel's February 10, 2023, Second Supplemental Report.</i> (Served on Mar. 3, 2023).	July 28, 2023	
9	Expert Witness Report, Prof. Mark Hoekstra, Response to Prof. Eric McDaniel's February 28, 2022, Initial Report. (Served on Mar. 29, 2022).	July 28, 2023	
10	Expert Witness Report, Prof. Mark Hoekstra, <i>Response to Prof. Kenneth R. Mayer's March 6, 2023, Supplemental Report.</i> (Served on Apr. 5, 2023).	July 28, 2023	
11	Notice of Correction to April 5, 2023, Expert Report of Prof. Mark Hoekstra, PhD, Written in Response to the March 6, 2023, Report by Prof. Kenneth Mayer. (Served on Apr. 25, 2023).	July 28, 2023	
12	Expert Witness Report, Dr. Stephen C. Graves. (Served on Mar. 29, 2022).	July 28, 2023	
13	Election Advisory No. 2021-18, Re: Revised: March 1, 2022, Primary Election and May 24, 2022, Primary Runoff Election Law Calendar, dated November 12, 2021. (STATE097860-908).	July 28, 2023	
14	Election Advisory No. 2021-21, Re: Legislative Summary – Second and Third Special Sessions, dated November 19, 2021. (STATE001483-502).	July 28, 2023	
15	Election Advisory No. 2021-23, Re: May 7, 2022, Election Law Calendar, dated December 10, 2021. (STATE097909-48).	July 28, 2023	

16	Election Advisory No. 2022-07, Re: NEW LAW: Changes to Early Voting by Personal Appearance – House Bill 2025, House Bill 3107, and Senate Bill 1, dated January 21, 2022. (STATE001577–93)	July 28, 2023	
17	Election Advisory No. 2022-08, Re: NEW LAW: Senate Bill 1 – Opportunity to Correct Defects on Application for a Ballot by Mail and Carrier Envelope, dated November 19, 2021. (STATE034294–321)	July 28, 2023	
18	Election Advisory No. 2022-09, NEW LAW: Changes to Poll Watcher Requirements Under House Bill 3107 and Senate Bill 1, dated February 4, 2022. (STATE060559)	July 28, 2023	
19	Election Advisory No. 2022-12, Re: Additional Procedures Regarding Correction of Defects on Application for Ballot by Mail or Carrier Envelope, dated February 11, 2022. (STATE001469–73).	July 28, 2023	
20	Election Advisory No. 2022-18, Re: Additional Ballot by Mail Procedures for May Uniform Election and Primary Runoff Election, dated April 26, 2022. (STATE087955–58)	July 28, 2023	
21	Election Advisory No. 2022-25, Re: November 8, 2022, Election Law Calendar, dated June 20, 2022, dated June 20, 2022. (STATE122992–3039)	July 28, 2023	
22	Spreadsheet created by Secretary of State in response to media inquiries, listing mail-ballot rejection rates for 2022 elections. (STATE115581–616).	July 28, 2023	
23	Final Report on Audit of 2020 General Election in Texas. (STATE115222–580).	July 28, 2023	
24	Executive Summary to Audit 2020 General Election in Texas (STATE115212–221).	July 28, 2023	
25	Harris County Post Election Assessment of the November 8, 2022, General Election. (STATE170230–83).	July 28, 2023	
26	Handbook for Election Judges and Clerks, <i>Qualifying Voters on Election Day 2022</i> , Secretary of State, revised July 2022. (STATE110976–1056).	July 28, 2023	

27	Handbook for Election Judges and Clerks, <i>Early Voting Ballot Board & Signature Verification Committee</i> , Secretary of State, revised July 2022. (Exhibit 17 – February 28, 2023, Dep. of Jacquelyn Callanen).	July 28, 2023	
28	Poll Watcher's Guide, Secretary of State, revised January 2022. (STATE106313–337).	July 28, 2023	
29	Draft of Poll Watcher Online Training, Secretary of State, January 20, 2022 (STATE035175–90).	July 28, 2023	
30	Texas Voter Registration Application (Spanish) (STATE046251–52).	July 28, 2023	
31	Texas Voter Registration Application (English) (STATE046253–54).	July 28, 2023	
32	Federal Post Card Application (Exhibit 3 – July 29, 2022, Dep. of Scott Wiedmann).	July 28, 2023	
33	Federal Write-In Absentee Ballot (Exhibit 4 – July 29, 2022, Dep. of Scott Wiedmann).	July 28, 2023	
34	Form 4-20, Certificate of Appointment of Poll Watcher by a Candidate, January 2022. (STATE060813–14).	July 28, 2023	
35	Form 4-21, Certificate of Appointment of Poll Watcher by Political Party, January 2022. (STATE060815–16).	July 28, 2023	
36	Form 4-22, Certificate of Appointment of Poll Watcher for Propositions or Measures, January 2022 (STATE060817–16).	July 28, 2023	
37	Form 4-23, Certificate of Appointment of Poll Watcher by Registered Voters on Behalf of a Write-In Candidate, January 2022 (STATE060819–20).	July 28, 2023	
38	Form 5-21, Ballot Envelope (For Secrecy), January 2022. (STATE061390–91).	July 28, 2023	
39	Form 6-2, Notice of Rejected Application for Ballot by Mail, January 2022. (STATE031641–42).	July 28, 2023	
40	Form 6-3, Notice of Rejected Application for Ballot by Mail - Missing or Incorrect Personal Identification Numbers, January 2022. (STATE031643–44).	July 28, 2023	
41	Form 6-4, Notice of Rejected Application for Ballot by Mail - Required Personal Identification Number is Not Associated with Your Voter Record, January 2022. (STATE074329–30).	July 28, 2023	

42	Form 6-6, Request to Cancel Application for Ballot by Mail – Early Voting Clerk’s Form, January 2022. (STATE091410–11).	July 28, 2023	
43	Form 6-11, EVC Notice of Carrier Defect Mailed with Corrective Action Form (Spanish), April 2022. (STATE123304–06).	July 28, 2023	
44	Form 6-11, EVC Notice of Carrier Defect Mailed with Corrective Action Form (English), April 2022. (STATE123307–09).	July 28, 2023	
45	Form 6-12, EVC Notice of Carrier Defect Phone with Corrective Action Form (Spanish), April 2022. (STATE123310–12).	July 28, 2023	
46	Form 6-12, EVC Notice of Carrier Defect Phone with Corrective Action Form (English), April 2022. (STATE123313–15).	July 28, 2023	
47	Form 6-13, Notice of Surrendered Ballot by Mail, January 2022. (STATE034285).	July 28, 2023	
48	Form 6-14, Corrective Action Form for Defective Carrier Envelope, January 2022. (STATE034286).	July 28, 2023	
49	Form 6-15, Carrier Envelope for Early Voting Ballot (regular ABBM), July 2022. (STATE138768–70).	July 28, 2023	
50	Form 6-17, Information about Returning Your Carrier Envelope, January 2022. (STATE074293–94).	July 28, 2023	
51	Form 6-35, Notes for Carrier Envelope (FPCA), January 2022. (STATE01634).	July 28, 2023	
52	Form 6-36, Information about Returning Your Voted Mail Ballot (FPCA Insert), January 2022. (STATE031652–53).	July 28, 2023	
53	Form 6-37, Official Election Signature Sheet for an FPCA Voter, December 2021 (English/Spanish). (STATE001643–44).	July 28, 2023	
54	Form 7-33 (AW7-7b), Notice of Voting Order Priority, January 2022. (STATE033209)	July 28, 2023	
55	Form 7-58, Oath of Assistance and Interpreter, July 2022. (STATE138771–72).	July 28, 2023	
56	Form 7-59, Information of Person that Provided Transportation to Seven or More Voters for Curbside Voting, October 2022. (Exhibit 9 – March 21, 2023, Dep. of Lauren Smith).	July 28, 2023	

57	Form 8-15, Notice of Rejected Ballot, January 2022. (STATE152170).	July 28, 2023	
58	Form 8-20, Roster of Voters with Defective Carrier Envelopes – Returned to the Voter by Mail, January 2022. (STATE034287).	July 28, 2023	
59	Form 8-21, Roster of ABM Voters with Defective Carrier Envelopes – Notified by Phone or Email, January 2022. (STATE034288).	July 28, 2023	
60	Form 8-22, Roster of FPCA Voters with Defective Carrier Envelopes – Notified by Phone or Email, January 2022. (STATE034289).	July 28, 2023	
61	Form 8-23, Notice of Carrier Defect – Carrier Envelope Returned to the Voter by Mail, January 2022. (STATE034290).	July 28, 2023	
62	Form 8-24, Notice of Carrier Defect – Vote Notified of Carrier Envelope Defect by Phone or Email, January 2022. (STATE034292).	July 28, 2023	
63	Instructions for Form 9-12, Preliminary Election Reconciliation - Unofficial Totals (Election Day), February 2022. (STATE019487–488).	July 28, 2023	
64	Form 9-12, Preliminary Election Reconciliation - Unofficial Totals (Election Day), February 2022. (STATE019489).	July 28, 2023	
65	Form 9-13, Election Reconciliation Form – Official Results (Canvass Form) February 2022. (STATE019490).	July 28, 2023	
66	Instructions for Form 9-13, Election Reconciliation Form - Official Results (Canvass Form), February 2022. (STATE019491–92).	July 28, 2023	
67	January 18, 2022, Email from Election Security Trainer Alexa Buxkemper to Legal Director Christina Adkins, Re: How many forms.... (STATE033331–32).	July 28, 2023	
68	Carrier Envelope Insert utilized by Denton County to remind voters of ID number requirement. (STATE154278).	July 28, 2023	
69	Carrier Envelope Insert utilized by Travis County to remind voters of ID number requirement. (064.134768–69).	July 28, 2023	
70	Carrier Envelope Insert utilized by Travis County to remind voters of ID number requirement. (064.134775–76).	July 28, 2023	

71	ABBM Insert utilized by Travis County to remind voters of ID number requirement. (064.134766–67).	July 28, 2023	
72	ABBM Insert with Numbers utilized by Travis County to remind voters of ID number requirement. (064.134773–74).	July 28, 2023	
73	Carrier Envelope Insert utilized by Harris County in 2022 Primaries to remind voters of ID number requirement (English/Spanish). (TATUM_005333–34).	July 28, 2023	
74	Carrier Envelope Insert utilized by Harris County to remind voters of ID number requirement (Chinese/English). (TATUM_005335–36).	July 28, 2023	
75	Carrier Envelope Insert utilized by Harris County to remind voters of ID number requirement (Spanish/English). (TATUM_005337–38).	July 28, 2023	
76	Carrier Envelope Insert utilized by Harris County to remind voters of ID number requirement (Vietnamese/English). (TATUM_005337–38).	July 28, 2023	
77	Carrier Envelope Insert utilized by Bexar County in the May 7, 2022, Local Election and May 24, 2022, Primary Runoff to remind voters of ID number requirement. (Exhibit C – April 20, 2022, Dep. of Jacquelyn Callanan).	July 28, 2023	
78	Carrier Envelope Insert utilized by Bexar County in the November 8, 2022, General Election to remind voters of ID number requirement. (Exhibit 13 – February 28, 2023, Dep. of Jacquelyn Callanan).	July 28, 2023	
79	Carrier Envelope Insert utilized by Hays County to remind voters of ID number requirement. (STATE139500–01).	July 28, 2023	
80	Carrier Envelope Insert utilized by Kleberg County to remind voters of ID number requirement. (STATE142722).	July 28, 2023	
81	ABBM Insert utilized by Kleberg County to remind voters of ID number requirement. (STATE140753).	July 28, 2023	
82	CONFIDENTIAL Election Fraud Violations Chart, Office of the Attorney General, updated April 20, 2022. (STATE112177–93).	July 28, 2023	

83	CONFIDENTIAL Instances of Suspected Illegal Voting Since March 1, 2018 – Cases Opened, Office of the Attorney General. (STATE112155–57).	July 28, 2023	
84	CONFIDENTIAL Case Tracking Spreadsheet, Election Integrity Unit, Office of the Attorney General. (STATE112158–59).	July 28, 2023	
85	2020 Complaint Log, Secretary of State (STATE078234).	July 28, 2023	
86	2016–2019 Complaint Log, Secretary of State (STATE078237).	July 28, 2023	
87	Election Fraud Complaints Referred for Investigation: SOS Referrals, updated May 10, 2022. (STATE107717–32).	July 28, 2023	
88	March 11, 2021, Email from Director of Government Relations Ryan Fisher at the Office of Attorney General to Jessica Hart; Re: OAG Election Fraud Section. (STATE090960).	July 28, 2023	
89	Power Point Presentation, <i>Election Integrity</i> . (STATE054622–77).	July 28, 2023	
90	Indictment, <i>Texas v. Ward</i> , Cause No. 50947-B (STATE098012–14).	July 28, 2023	
91	Indictment, <i>Texas v. Jackson</i> , Cause No. 50949-B (STATE097980–98000).	July 28, 2023	
92	Indictment, <i>Texas v. Burns</i> , Cause No. 50951-B (STATE098008–11).	July 28, 2023	
93	Indictment, <i>Texas v. Brown</i> , Cause No. 50953-B (STATE098001–07).	July 28, 2023	
94	Indictment, <i>Texas v. Molina</i> , W-19-0134-J22. (STATE098413–18).	July 28, 2023	
95	Indictment, <i>United States v. Orelllana</i> , Case No. 9:18-cr-00020 (STATE098510–15).	July 28, 2023	
96	Judgment in a Criminal Case, <i>United States v. Orelllana</i> , Case No. 9:18-cr-00020 (STATE098516–22).	July 28, 2023	
97	Plea Agreement, <i>United States v. Orelllana</i> , Case No. 9:18-cr-00020 (STATE098523–32).	July 28, 2023	
98	Warrant of Arrest, <i>Texas v. Molina</i> , W-19-0134-J22. (STATE098537–44).	July 28, 2023	
99	Agreement, OAG Prosecution Diversion Program, related to illegal voting, signed March 8, 2022. (STATE087320).	July 28, 2023	

100	Agreement, OAG Prosecution Diversion Program, related to unlawful assistance, signed June 6, 2018. (STATE087340).	July 28, 2023	
101	Agreement, OAG Prosecution Diversion Program, related to illegal voting and false information on government record, signed October 28, 2021. (STATE087342).	July 28, 2023	
102	Agreement, OAG Prosecution Diversion Program, related to illegal voting and false information on government record, signed August 14, 2020. (STATE087345).	July 28, 2023	
103	Agreement, OAG Prosecution Diversion Program, related to illegal voting and false information on government record, signed August 19, 2020. (STATE087360).	July 28, 2023	
104	Agreement, OAG Prosecution Diversion Program, related to illegal voting and false information on government record, signed June 5, 2018. (STATE087365).	July 28, 2023	
105	Agreement, OAG Prosecution Diversion Program, related to unlawful assistance, signed June 15, 2018. (STATE087341).	July 28, 2023	
106	Agreement, OAG Prosecution Diversion Program, related to failure to sign application as a witness, signed May 19, 2021. (STATE087373).	July 28, 2023	
107	Agreement, OAG Prosecution Diversion Program, related to violations of Tex. Elec. Code §§ 64.012 and 276.013, signed August 5, 2019. (STATE087375).	July 28, 2023	
108	Agreement, OAG Prosecution Diversion Program, related to false information on application for ballot by mail, signed June 26, 2018. (STATE087376).	July 28, 2023	
109	Agreement, OAG Prosecution Diversion Program, related to false information on application for ballot by mail, signed June 25, 2018. (STATE087377)	July 28, 2023	
110	Agreement, OAG Prosecution Diversion Program, related to false information on application for ballot by mail, signed June 25, 2018. (STATE087380).	July 28, 2023	
111	Agreement, OAG Prosecution Diversion Program, related to illegal voting and false information on application for ballot by mail, signed July 25, 2018. (STATE087381).	July 28, 2023	

112	Agreement, OAG Prosecution Diversion Program, related to illegal voting and false information on application for ballot by mail, signed July 25, 2018. (STATE087381).	July 28, 2023	
113	Agreement, OAG Prosecution Diversion Program, related to false information on application for ballot by mail, signed September 17, 2018. (STATE087386).	July 28, 2023	
114	Agreement, OAG Prosecution Diversion Program, related to false information on application for ballot by mail, signed June 26, 2018. (STATE087391).	July 28, 2023	
115	Agreement, OAG Prosecution Diversion Program, related to false information on application for ballot by mail, signed June 26, 2018. (STATE087392).	July 28, 2023	
116	Agreement, OAG Prosecution Diversion Program, related to false information on application for ballot by mail, signed June 26, 2018. (STATE087393).	July 28, 2023	
117	Final Judgment, <i>Rangle v. Rodriguez</i> , NO. 2022CVK001669D1 (49th Dist. Ct., Webb County, Feb. 2, 2023) (STATE184628–37).	July 28, 2023	
118	United States' Responses to Texas's First Set of RFPs – Privilege Log (Exhibit 10 – May 9, 2022, Dep. of Remi Garza).	July 28, 2023	
119	November 4, 2013, Press Release from FBI San Antonio Field Office, Re: Former Cameron County Woman Convicted of Voter Fraud. (STATE107789).	July 28, 2023	
120	June 5, 2014, Press Release from Department of Justice U.S. Attorney's Office Southern District of Texas, Re: Campaign Worker Pleads Guilty To Buying Votes In Donna School Board Election. (STATE107844–45)	July 28, 2023	
121	June 19, 2014, Press Release from Department of Justice, Re: Campaign Manager Charged with Buying Votes in a Donna, Texas, School Board Election. (STATE097645–46)	July 28, 2023	
122	December 1, 2014, Press Release from FBI San Antonio Field Office, Re: Campaign Manager Pleads Guilty to Conspiracy to Buy Votes in a Donna, Texas School Board Election. (STATE107785)	July 28, 2023	

123	House Journal, Eightieth Legislature, Regular Session, Sixtieth Day – Monday April 23, 2007. (STATE098214–75).	July 28, 2023	
124	Transcript of Texas Senate Committee on State Affairs, March 18, 2019, Hearing, Re: Senate Bill 9. (STATE098545–658).	July 28, 2023	
125	December 3, 2018, Letter from Senator Judith Zaffirini to Senator Bryan Hughes regarding Senate Select Committee on Election Security. (STATE108349–50).	July 28, 2023	
126	Chuck DeVore, <i>The Role of Voter List Maintenance and Voter Identification in Election Integrity</i> , Texas Public Policy Foundation, March 2021. (TXLEG_0001066).	July 28, 2023	
127	July 22, 2020, Letter from Harris County Clerk Chris Hollins to Governor Greg Abbott, Re: Extended Early Voting Days for November 2020 Election. (STATE098283).	July 28, 2023	
128	Governor’s Proclamation, dated July 27, 2020, suspending certain statutes concerning elections on November 3, 2020. (STATE098533–36).	July 28, 2023	
129	Governor Proclamation, dated October 1, 2020, suspending certain statutes concerning the November 3, 2020, elections. (Exhibit 3 – May 6, 2022, Dep. of Chris Hollins).	July 28, 2023	
130	Complaint, ECF 1, <i>Tex. League of United Latin Am. Citizens v. Abbott</i> , 493 F. Supp. 3d 548, 567 (W.D. Tex. 2020), vacated sub nom. <i>Tex. League of United Latin Am. Citizens v. Hughs</i> , No. 20-50867, 2021 WL 1446828 (5th Cir. Feb. 22, 2021). (Exhibit 4 – May 6, 2022, Dep. of Chris Hollins).	July 28, 2023	
131	Justice Devine Dissent, <i>In re Hotze</i> , et al, No. 20-0751, 627 S.W.3d 652 (Tex. 2020). (Exhibit 13 – October 6, 2022, Dep. of Sen. Carol Alvarado).	July 28, 2023	
132	August 25, 2020, Tweet from Harris County Elections about unsolicited ABBMS. (Exhibit 6 – May 6, 2022, Dep. of Chris Hollins).	July 28, 2023	
133	August 27, 2020, Letter from Director of Elections Keith Ingram to Harris County Clerk Chris Hollins about unsolicited	July 28, 2023	

	ABBM. (Exhibit 3 – October 6, 2022, Dep. of Sen. Carol Alvarado).		
134	Petition, <i>State v. Hollins</i> , NO. 14-20-00627-CV (127th Dist. Ct., Harris County, Tex. Aug. 31, 2020). (Exhibit 7 – May 6, 2022, Dep. of Chris Hollins).	July 28, 2023	
135	August 31, 2020, Letter from Charles K. Eldred to Seth Hopkins about Rule 11 Agreement in <i>State v. Hollins</i> . (Exhibit 8 – May 6, 2022, Dep. of Chris Hollins).	July 28, 2023	
136	Opinion, <i>State v. Hollins</i> , 620 S.W.3d 400, 403 (Tex. 2020). (Exhibit 9 – May 6, 2022, Dep. of Chris Hollins).	July 28, 2023	
137	Webpage, <i>Drive-Thru Voting</i> , HARRIS COUNTY ELECTION DIVISION, https://harrisvotes.com/drivethruvoting . (STATE097764–67) (Exhibit 10 - May 6, 2022, Dep. of Chris Hollins).	July 28, 2023	
138	October 16, 2020, Letter from Attorney General Ken Paxton to Texas Election Officials about drive-thru voting. (Exhibit 7 – October 6, 2022, Dep. of Sen. Carol Alvarado).	July 28, 2023	
139	Petition for Writ of Mandamus, <i>In re Hotze</i> , et al, No. 20-0819, 610 S.W.3d 909 (Tex. 2020). (Exhibit 11 – May 6, 2022, Dep. of Chris Hollins).	July 28, 2023	
140	Justice Devine Dissent, <i>In re Hotze</i> , et al, No. 20-0819, 610 S.W.3d 909 (Tex. 2020). (STATE098278–82).	July 28, 2023	
141	Map of 24-Hour Voting Locations in Harris County during November 2020 General Election. (STATE097483).	July 28, 2023	
142	Map of Drive Thru Voting Locations in Harris County during November 2020 General Election. (STATE097763).	July 28, 2023	
143	September 10, 2020, Email from Elections Division Attorney Charles Pinney to Assistant Director Dan Hayes, Re: Travis County Central Count Accommodations for Poll Watchers. (STATE092408–09).	July 28, 2023	
144	Picture taken of sequestered poll watchers in Travis County's central count during November 2020 General Election. (Exhibit 16 – May 11, 2022, Dep. of Bridgette Escobedo).	July 28, 2023	

145	Emergency Petition for Writ of Mandamus, <i>In re Mackowiak, et al</i> , No. 20-0889 (Tex. 2020). (STAT098659–724).	July 28, 2023	
146	Brief of the Texas Attorney General, <i>In re Mackowiak, et al</i> , No. 20-0889 (Tex. 2020). (STATE097484–90).	July 28, 2023	
147	Rule 11 Agreement between Relators and Respondent, <i>In re Mackowiak, et al</i> , No. 20-0889 (Tex. 2020). (STATE097978–79).	July 28, 2023	
148	November 11, 2020, Press Release, <i>Travis County Candidate Settles with Travis County Clerk</i> , Martin Harry for District Attorney. (STATE098419)	July 28, 2023	
149	December 8, 2022, Letter from Harris County Election Administrator Clifford Tatum to Secretary of State John Scott, about Countywide Polling Place Program. (STATE122932–36).	July 28, 2023	
150	Harris County November 6, 2018, General and Special Elections Early Voting Schedule. (STATE170226).	July 28, 2023	
151	Harris County November 3, 2020, General and Special Elections Early Voting Schedule. (STATE098175–76) (Exhibit 13 – May 6, 2022, Dep. of Chris Hollins).	July 28, 2023	
152	Harris County Early Voting Polling Location List for November 3, 2020, General and Special Elections. (STATE098209–213).	July 28, 2023	
153	Harris County Election Day Polling Location List for November 3, 2020, General and Special Elections. (STATE098178–208).	July 28, 2023	
154	Harris County November 8, 2022, General and Special Elections Early Voting Schedule. (STATE170227–28).	July 28, 2023	
155	Turnout and Registration Figures, SECRETARY OF STATE, https://www.sos.state.tx.us/elections/historical/70-92.shtml . (STATE099276–98).	July 28, 2023	
156	<i>Bee County Voter Registration Figures</i> , SECRETARY OF STATE, https://www.sos.state.tx.us/elections/historical/bee.shtml . (STATE107733).	July 28, 2023	
157	<i>Bexar County Voter Registration Figures</i> , SECRETARY OF STATE, https://www.sos	July 28, 2023	

	.state.tx.us/elections/historical/bexar.shtml. (STATE107734–35).		
158	<i>Cameron County Voter Registration Figures</i> , SECRETARY OF STATE, https://www.sos.state.tx.us/elections/historical/cameron.shtml . (STATE107736–37).	July 28, 2023	
159	<i>Collin County Voter Registration Figures</i> , SECRETARY OF STATE, https://www.sos.state.tx.us/elections/historical/collin.shtml . (STATE107738–39).	July 28, 2023	
160	<i>Dallas County Voter Registration Figures</i> , SECRETARY OF STATE, https://www.sos.state.tx.us/elections/historical/dallas.shtml . (STATE107740–41).	July 28, 2023	
161	<i>Denton County Voter Registration Figures</i> , SECRETARY OF STATE, https://www.sos.state.tx.us/elections/historical/denton.shtml . (STATE107742–43).	July 28, 2023	
162	<i>DeWitt County Voter Registration Figures</i> , SECRETARY OF STATE, https://www.sos.state.tx.us/elections/historical/dewitt.shtml . (STATE107744).	July 28, 2023	
163	<i>El Paso County Voter Registration Figures</i> , SECRETARY OF STATE, https://www.sos.state.tx.us/elections/historical/elpaso.shtml . (STATE107745–46).	July 28, 2023	
164	<i>Fort Bend County Voter Registration Figures</i> , SECRETARY OF STATE, https://www.sos.state.tx.us/elections/historical/fortbend.shtml . (STATE107747–48).	July 28, 2023	
165	<i>Galveston County Voter Registration Figures</i> , SECRETARY OF STATE, https://www.sos.state.tx.us/elections/historical/galveston.shtml . (STATE107749).	July 28, 2023	
166	<i>Guadalupe County Voter Registration Figures</i> , SECRETARY OF STATE, https://www.sos.state.tx.us/elections/historical/guadalupe.shtml . (STATE 107750–51).	July 28, 2023	
167	<i>Harris County Voter Registration Figures</i> , SECRETARY OF STATE, https://www.sos.state.tx.us/elections/historical/harris.shtml . (STATE107752–53).	July 28, 2023	
168	<i>Hidalgo County Voter Registration Figures</i> , SECRETARY OF STATE, https://www.sos.state.tx.us/elections/historical/hidalgo.shtml . (STATE107754–55).	July 28, 2023	

169	<i>Medina County Voter Registration Figures</i> , SECRETARY OF STATE, https://www.sos.state.tx.us/elections/historical/medina.shtml . (STATE107756).	July 28, 2023	
170	<i>Montgomery County Voter Registration Figures</i> , SECRETARY OF STATE, https://www.sos.state.tx.us/elections/historical/montgomery.shtml . (STATE107757).	July 28, 2023	
171	<i>Starr County Voter Registration Figures</i> , SECRETARY OF STATE, https://www.sos.state.tx.us/elections/historical/starr.shtml . (STATE107758–59).	July 28, 2023	
172	<i>Tarrant County Voter Registration Figures</i> , SECRETARY OF STATE, https://www.sos.state.tx.us/elections/historical/tarrant.shtml . (STATE107760–61).	July 28, 2023	
173	<i>Travis County Voter Registration Figures</i> , SECRETARY OF STATE, https://www.sos.state.tx.us/elections/historical/travis.shtml . (STATE107762–63).	July 28, 2023	
174	2020-2021 Voting Assistance Guide, Texas (STATE115160–75).	July 28, 2023	
175	2022-2023 Voting Assistance Guide, Alabama (STATE115060–65).	July 28, 2023	
176	2022-2023 Voting Assistance Guide, Georgia (STATE115074–85).	July 28, 2023	
177	2022-2023 Voting Assistance Guide, Florida (STATE115066–73).	July 28, 2023	
178	2022-2023 Voting Assistance Guide, Hawaii (STATE115086–91).	July 28, 2023	
179	2022-2023 Voting Assistance Guide, Louisiana (STATE115092–99).	July 28, 2023	
180	2022-2023 Voting Assistance Guide, Mississippi (STATE115100–07).	July 28, 2023	
181	2022-2023 Voting Assistance Guide, New Jersey (STATE115108–13).	July 28, 2023	
182	2022-2023 Voting Assistance Guide, New Mexico (STATE115114–19).	July 28, 2023	
183	2022-2023 Voting Assistance Guide, North Carolina (STATE115120–29).	July 28, 2023	
184	2022-2023 Voting Assistance Guide, North Dakota (STATE115130–35).	July 28, 2023	
185	2022-2023 Voting Assistance Guide, Pennsylvania (STATE115136–43).	July 28, 2023	
186	2022-2023 Voting Assistance Guide, South Dakota (STATE115144–51).	July 28, 2023	

187	2022-2023 Voting Assistance Guide, Tennessee (STATE115152–59).	July 28, 2023	
188	2022-2023 Voting Assistance Guide, Texas (STATE115176–91).	July 28, 2023	
189	2022-2023 Voting Assistance Guide, Virginia (STATE115192–203).	July 28, 2023	
190	2022-2023 Voting Assistance Guide, West Virginia (STATE115204–209).	July 28, 2023	
191	Webpage, <i>State Laws Governing Early Voting</i> , NATIONAL CONFERENCE OF STATE LEGISLATURES (Aug. 8, 2019). (Exhibit 1 – May 2, 2022, Dep. of Dana DeBeauvoir).	July 28, 2023	
192	List of Amendment to Senate Bill 1, Texas Legislature Online. (Exhibit 21 – October 6, 2022, Dep. of Sen. Carol Alvarado).	July 28, 2023	
193	Enrolled version of House Bill 315. An Act Relating to a Statement by the Secretary of State Regarding the Furnishing of Certain Personal Information on an Application for a Ballot to be Voted by Mail, H.B. 315, 88th Leg., R.S. (2023) (STATE182552–55).	July 28, 2023	
194	Enrolled version of House Bill 3159. An Act Relating to the Use of an Accessible Absentee Mail System by Certain Voters, H.B. 3159, 88th Leg., R.S. (2023) (STATE182586–91).	July 28, 2023	
195	Enrolled version of House Bill 357. An Act Relating to the Requirements to Access the Online Tracker of an Application for a Ballot to be Voted by Mail and to the Date of Runoff Elections, H.B. 357, 88th Leg., R.S. (2023) (STATE182637–40).	July 28, 2023	
196	Enrolled version of Senate Bill 1052. An Act Relating to the Compensation of an Election Judge or Clerk, S.B. 1052, 88th Leg., R.S. (2023) (STATE182661–62).	July 28, 2023	
197	Enrolled version of Senate Bill 1599. An Act Related to Ballots Voted by Mail, S.B. 1599, 88th Leg., R.S. (2023) (STATE182732–43).	July 28, 2023	
198	Enrolled version of Senate Bill 477. An Act Relating to Accommodating Voters with a Disability, S.B. 477, 88th Leg., R.S. (2023) (STATE182774–78).	July 28, 2023	
199	Enrolled version of Senate Bill 975. An Act Relating to the Procedures for the Issuance of a Personal Identification Certificate to a	July 28, 2023	

	Person Whose Driver's License is Surrendered, S.B. 975, 88th Leg., R.S. (2023) (STATE182805-06).		
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May Offer

STATE DEFENDANTS' EXHIBIT NO.	DESCRIPTION	DATE EXHIBIT IDENTIFIED	ADMITTED OR WITHDRAWN
200	Expert Witness Report, Prof. Eitan Hersh, <i>Second Supplement to Report on Identification Number Requirements for Mail Balloting under SB 1</i> . (Served on Feb. 10, 2023).	July 28, 2023	
201	Expert Witness Report, Prof. Eitan Hersh, <i>Addendum to Second Supplement to Report on Identification Number Requirements for Mail Balloting under SB 1</i> . (Served on May 8, 2023).	July 28, 2023	
202	Election Advisory No. 2022-13, Certain Activities in Vicinity of Polling Places, dated February 14, 2022. (STATE001463-67).	July 28, 2023	
203	Election Advisory No. 2022-02, Instructions and Deadlines for Mailing/Emailing Ballots Under the Federal "MOVE Act" for Overseas Voters, dated January 10, 2022. (STATE124074-79).	July 28, 2023	
204	Election Advisory No. 2021-14, Re: Impact of Redistricting on Certain Election Deadlines and Procedures, dated November 1, 2021. (STATE001477-82).	July 28, 2023	
205	Election Advisory No. 2021-10, Re: NEW LAW: SB 1111 (2021, Regular Session) Address Confirmation Process and Forms, dated August 31, 2021. (STATE098870-72).	July 28, 2023	
206	Election Advisory No. 2021-09, Re: 2021 Legislative Summary – 87 th Regular Session, dated July 30, 2021. (STATE098864-69).	July 28, 2023	
207	Election Advisory No. 2021-08, Re: November 2, 2021, Election Law Calendar – Last Updated: June 2021. (STATE097826-859).	July 28, 2023	

208	Election Advisory No. 2020-27, Re: Minority Language Requirements, dated September 7, 2020. (STATE097824–25).	July 28, 2023	
209	Election Advisory No. 2020-17, Re: November 3, 2020, Election Law Calendar – Updated August 2020. (STATE097791–823).	July 28, 2023	
210	Election Advisory No. 2019-09, Re: Minority Language Requirements, dated June 25, 2019. (STATE097788).	July 28, 2023	
211	Form 5-6, Roster for Voters Hand-Delivering Carrier Envelope, January 2022. (STATE046603)	July 28, 2023	
212	Form 5-16, Application for Emergency Early Voting Ballot due to Death in the Family, January 2022. (STATE138843-44).	July 28, 2023	
213	Form 5-18, Application for Emergency Early Voting Ballot Due to Sickness or Physical Disability, January 2022 (STATE138169–70).	July 28, 2023	
214	Instructions for Form 5-18, Application for Emergency Early Voting Ballot Due to Sickness or Physical Disability, January 2022 (STATE138054).	July 28, 2023	
215	Form 5-19, Application for Emergency Early Voting Ballot Board Due to Sickness of Physical Disability: Instructions for Voter after Marking the Ballot, January 2022 (STATE138171).	July 28, 2023	
216	Form 5-16(b), Request for Updated Annual Application for Ballot by Mail, prescribed by the Secretary of State, October 2022. (STATE185506-07).	July 28, 2023	
217	Form 6-15, Carrier Envelope for Early Voting Ballot, May 2022. (STATE123087–89).	July 28, 2023	
218	Instructions for Form 6-15, Carrier Envelope for Early Voting Ballot, May 2022. (STATE123085).	July 28, 2023	
219	September 27, 2022, Email from Director of Elections Keith Ingram to Joyce LeBombard, League of Women Voters, Re: Two More Quick Questions. (STATE140777–79).	July 28, 2023	

220	December 9, 2021, Email from Deputy Director J. Scott Wiedmann, Federal Voting Assistance Program, to Legal Director Christina Adkins, Re: RE: [Non-DoD Source] Questions on Carrier Envelopes for FPCA voters. (STATE031889–90).	July 28, 2023	
221	February 1, 2022, Email from Elections Division Attorney Melanie Best and Christina Obermiller, Department of Defense, Federal Voting Assistance Program, Re: FPCA ID Question – FVAP/Obermiller. (STATE04893–94).	July 28, 2023	
222	April 19, 2022, Mass Email from Elections Division Attorney Heidi Martinez to Election Officials, Re: Forms Release 4/19/2022. (STATE123303).	July 28, 2023	
223	July 7, 2022, Mass Email from Director of Elections Keith Ingram to Election Officials, Re: Notice of Court Order and Revised Election Forms (123318–19).	July 28, 2023	
224	August 25, 2022, Mass Email from Secretary of State’s Elections Internet account to Election Officials, Re: Important Information for the November 8, 2022, General Election. (STATE124342–44).	July 28, 2023	
225	September 21, 2022, Mass Email from Secretary of State’s Elections Internet account to Election Officials, Re: Updated Forms and Resources – Notice of Court Order and Revised Election Forms. (STATE138776–78)	July 28, 2023	
226	October 11, 2022, Mass Email from Legal Director Christina Adkins to Election Officials, Re: Reminder – Webinar Today. (STATE124636–39).	July 28, 2023	
227	Request for Proposal, <i>Voter Education and Outreach Opportunities for 2022 Elections</i> , Secretary of State. (STATE137757–837).	July 28, 2023	
228	Report to the 88th Legislature on the Implementation of Educational Programs to Help Voters with Disabilities Understand How to Use Voting Systems Used in the State of Texas. (STATE137752–56).	July 28, 2023	

229	September 8, 2022, Press Release, <i>SOS 101: Voter Registration in Texas</i> , Texas Secretary of State Press Office. (STATE120522–25).	July 28, 2023	
230	October 12, 2022, Press Release, <i>SOS 101: Voting by Mail in Texas</i> , Texas Secretary of State Press Office. (STATE119692–98).	July 28, 2023	
231	September 20, 2022, Press Release, <i>Secretary Scott Marks National Voter Registration Day, Highlights Statewide ‘VoteReady’ Voter Education Campaign</i> , Texas Secretary of State Press Office. (STATE120634–41).	July 28, 2023	
232	November 7, 2022, Press Release, <i>What to Expect on Election Day in Texas</i> , Texas Secretary of State Press Office. (STATE122811–15).	July 28, 2023	
233	February 9, 2022, Email from Assistant Secretary of State for Communications Sam Taylor to Director of Elections Keith Ingram, Re: Correction to CNN story – incorrect information about new vote by mail ID requirement. (STATE046882–84).	July 28, 2023	
234	Webpage, <i>Voters with Special Needs</i> , EPCOUNTYVOTES.COM, https://epcountyvotes.com/voter_information/voters_with_special_needs . (STATE170217–19).	July 28, 2023	
235	Notice to Voters with Disabilities, Harris County (STATE170319).	July 28, 2023	
236	Webpage, <i>Services Available to Voters with Disabilities in Texas</i> , VOTETEXAS.GOV, https://www.votetexas.gov/voters-with-special-needs/ (STATE099301–04).	July 28, 2023	
237	Webpage, <i>FPCA Ballot Tracker</i> , TEXAS SECRETARY OF STATE, https://web.services.sos.state.tx.us/FPCA/index.aspx . (STATE170224–25).	July 28, 2023	
238	Handbook for Election Judges and Clerks, <i>Qualifying Voters on Election Day 2022</i> , Secretary of State, revised January 2022. (STATE034699–779).	July 28, 2023	
239	Poll Watcher’s Guide, Secretary of State, revised January 2022. (STATE106313–37).	July 28, 2023	
240	Travis County Poll Worker Training Manual (064.134855).	July 28, 2023	

241	Harris County Election Manual 2022–2023. (STATE170320–527).	July 28, 2023	
242	Frequently Asked Questions: Voting in Person (TATUM_005680).	July 28, 2023	
243	Power Point Presentation, <i>Poll Watchers</i> , County Election Officials Election Law Seminar, July 2018 (STATE085635–41).	July 28, 2023	
244	Power Point Presentation, <i>Communicating Legislative Changes: ID Requirements for Voting by Mail</i> , NASED Presentation, Secretary of State, February 2023. (STATE177246–68).	July 28, 2023	
245	Power Point Presentation, <i>SOS Updates 2021</i> , Secretary of State. (STATE075498–527).	July 28, 2023	
246	Power Point Presentation, <i>Elections 101</i> , Secretary of State, July 2020. (STATE085183–232).	July 28, 2023	
247	Power Point Presentation, <i>Early Voting in Person Changes</i> , Secretary of State (RFP14_000071).	July 28, 2023	
248	Power Point Presentation, FAQs on Applications for Ballot by Mail (ABBMs), Secretary of State. (STATE061321–24).	July 28, 2023	
249	Power Point Presentation, <i>Election Reconciliation–Official Totals</i> , Webinar, Secretary of State, March 2022. (STATE019553–72).	July 28, 2023	
250	Power Point Presentation, <i>Election Reconciliation Forms</i> , Webinar, Secretary of State, April 2022. (STATE087830–66).	July 28, 2023	
251	Power Point Presentation, <i>Election Reconciliation Forms</i> , Webinar, Secretary of State, October 2022. (STATE112370–414).	July 28, 2023	
252	Power Point Presentation, <i>Opportunity to Correct Defects on Application for Ballot by Mail and Carrier Envelope</i> , Secretary of State, February 2022. (STATE059522–557).	July 28, 2023	
253	Power Point Presentation, <i>Training for EVBB/SVC Members on New Ballot by Mail Procedures</i> , Secretary of State, April 2022 (STATE124844–94).	July 28, 2023	
254	Power Point Presentation, <i>Update from SOS</i> , Secretary of State, August 2022 (STATE111746–83).	July 28, 2023	

255	Power Point Presentation, <i>Training for EVBB/SVC Members on New Ballot by Mail Procedures: General Election for State and County Officers</i> , Secretary of State, October 2022 (STATE124640–65).	July 28, 2023	
256	Power Point Presentation, <i>Proactive Communication Strategies for Local Election Officials</i> , Secretary of State, Election Seminar, Secretary of State, November 2022. (STATE148646–70).	July 28, 2023	
257	Power Point Presentation, <i>Election Forms</i> , Election Seminar, Secretary of State, December 2022. (STATE114273–351)	July 28, 2023	
258	Online Poll Worker Training Program, Secretary of State, January 6, 2016 (STATE081477–98).	July 28, 2023	
259	2020 Election Administration and Voting Survey, U.S. Election Assistance Commission. (Exhibit 8 – April 7, 2023, Dep. of Tammy Patrick).	July 28, 2023	
260	2020 EAVS Manual, U.S. Election Assistance Commission. (STATE050649–92).	July 28, 2023	
261	2018 Election Administration and Voting Survey, U.S. Election Assistance Commission. (STATE114809 – 5059).	July 28, 2023	
262	2016 Election Administration and Voting Survey, U.S. Election Assistance Commission. (Exhibit 6 – April 7, 2023, Dep. of Tammy Patrick).	July 28, 2023	
263	2014 EAC Election Administration and Voting Survey Comprehensive Report, U.S. Election Commission. (STATE114498–808).	July 28, 2023	
264	2010 Election Administration and Voting Survey, U.S. Election Assistance Commission. (STATE114377 – 497).	July 28, 2023	
265	Travis County Early Voting Locations for November 3, 2020, General Election (STATE098965).	July 28, 2023	
266	Travis County Election Day Vote Centers for November 3, 2020, General Election (STATE098974–76).	July 28, 2023	
267	Travis County Early Voting Locations for March 1, 2022, Primary Election (STATE098963).	July 28, 2023	

268	Travis County Election Day Vote Centers for March 1, 2022, Primary Election (STATE098966–68).	July 28, 2023	
269	Travis County Early Voting Locations for May 7, 2022, Local Elections (STATE098964).	July 28, 2023	
270	Travis County Election Day Vote Centers for May 7, 2022, Local Elections (STATE098969–71).	July 28, 2023	
271	Kerr County Polling Locations for November 8, 2022, General Election. (STATE170292).	July 28, 2023	
272	Election Reconciliation Form for November 8, 2022, General Election, Travis County (064.134709).	July 28, 2023	
273	Preliminary Election Reconciliation – Unofficial Totals for March 1, 2022, Primary Elections, Harris County (Exhibit 7 – April 20, 2022, Dep. of Isabel Longoria).	July 28, 2023	
274	Election Reconciliation Form for March 1, 2022, Democratic Primary Election, Harris County (Exhibit 8 – April 20, 2022, Dep. of Isabel Longoria).	July 28, 2023	
275	Election Reconciliation Form for March 1, 2022, Republican Primary Election, Harris County (Exhibit 9 – April 20, 2022, Dep. of Isabel Longoria).	July 28, 2023	
276	Election Reconciliation Form for November 8, 2022, General Election, Harris County (Tatum_005330).	July 28, 2023	
277	Election Reconciliation Form for November 8, 2022, General Election, Harris County (STATE170229).	July 28, 2023	
278	Harris County Community Partnership Presentation. (TATUM_005753).	July 28, 2023	
279	Reference Manual & Checklist April 2022, Harris County. (STATE098019– 174).	July 28, 2023	
280	Poll Worker Training November 8, 2022, General Election, Hays County (STATE181404–45).	July 28, 2023	
281	Webpage, <i>Countywide Vote Centers Information</i> , DALLASCOUNTYVOTES.ORG, https://www.dallascountyvotes.org/countywide-polling-places (STATE097760–62).	July 28, 2023	

282	Declaration of Brian Keith Ingram, ECF 43-1, <i>Tex. League of United Latin Am. Citizens v. Abbott</i> , 493 F. Supp. 3d 548, 567 (W.D. Tex. 2020), vacated sub nom. <i>Tex. League of United Latin Am. Citizens v. Hughs</i> , No. 20-50867, 2021 WL 1446828 (5th Cir. Feb. 22, 2021). (STATE098337–40).	July 28, 2023	
283	Reporters Record, Vol. 2 of 3, October 13, 2020, Hearing on Plaintiff's Application for Temporary Injunction and Defendants Plea to the Jurisdiction, <i>Anti-Defamation League Austin, Southwest, and Texoma Regions v. Abbott</i> , Cause No. D-1-GH-20-005550. (STATE098977–275).	July 28, 2023	
284	Appellant's Brief, <i>Abbott v. Anti-Defamation League Austin, Southwest, and Texoma Regions</i> , Appellate Cause No. 03-20-00498- CV, 2020 WL 6586318 (Tex. App.—Austin). (STATE097491–600).	July 28, 2023	
285	Appellant's Reply Brief, <i>Abbott v. Anti-Defamation League Austin, Southwest, and Texoma Regions</i> , Appellate Cause No. 03-20-00498- CV (Tex. App.—Austin). (STATE097601–40).	July 28, 2023	
286	Order, ECF 63, <i>Hotze v. Hollins</i> , No. 4:20-CV-03709, (S.D. Tex. Nov. 2, 2020), aff'd in part, vacated in part sub nom. <i>Hotze v. Hudspeth</i> , 16 F.4th 1121 (5th Cir. 2021). (Exhibit 12 – May 6, 2022, Dep. of Chris Hollins).	July 28, 2023	
287	John Burnett & Marisa Peñaloza, <i>In Rio Grande Valley, Some Campaign Workers Are Paid To Harvest Votes</i> , NPR (July 7, 2015). (STATE107793–808).	July 28, 2023	
288	Tim Acosta, <i>Judge tosses Kleberg County justice of the peace votes, orders new election</i> , CALLER TIMES (June 26, 2018). (STATE107811–13).	July 28, 2023	
289	Tim Acosta, <i>Robstown resident pleads guilty to voter fraud, barred from helping in future elections</i> , CALLER TIMES (June 14, 2018). (STATE107836–37).	July 28, 2023	
290	U.S. Census Bureau's Quick Facts: Harris County, Texas, population estimate July 1, 2021. (Exhibit 46 – October 6, 2022, Dep. of Sen. Carol Alvarado).	July 28, 2023	

291	<i>Risk for COVID-19 Infection, Hospitalization, and Death by Race/ Ethnicity</i> , CENTER FOR DISEASE CONTROL AND PREVENTION (Apr. 7, 2023), https://www.cdc.gov/coronavirus/2019-ncov/covid-data/investigations-discovery/hospitalization-death-by-race-ethnicity.html . (STATE170541).	July 28, 2023	
292	Report of the Commission on Federal Election Reform, <i>Building Confidence in U.S. Elections</i> , September 2005. (STATE097647-759).	July 28, 2023	
293	Transcript of Texas Senate Committee on State Affairs (Part I), August 9, 2021, Hearing, Re: Senate Bill 1. (STATE154280-302).	July 28, 2023	
294	Transcript of Texas Senate Committee on State Affairs (Part I), August 9, 2021, Hearing, Re: Senate Bill 1. (STATE154831-77).	July 28, 2023	
295	Transcript of Texas Senate Session (Part I), August 11, 2021, Re: Senate Bill 1. (STATE154831-77).	July 28, 2023	
296	Transcript of Texas Senate Session (Part II), August 11, 2021, Re: Senate Bill 1. (STATE156701-837).	July 28, 2023	
297	Transcript of Texas House Committee on Constitutional Rights and Remedies (Part I), August 23, 2021, Re: Senate Bill 1. (STATE160198-358).	July 28, 2023	
298	Transcript of Texas House Committee on Constitutional Rights and Remedies (Part II), August 23, 2021, Re: Senate Bill 1. (STATE162405-462).	July 28, 2023	
299	Transcript of Texas House of Representatives Session (Part I), August 26, 2021, Re: Senate Bill 1. (STATE163200-286).	July 28, 2023	
300	Transcript of Texas House of Representatives Session (Part II), August 26, 2021, Re: Senate Bill 1. (STATE165397-451).	July 28, 2023	
301	Transcript of Texas House of Representatives Session (Part I), August 27, 2021, Re: Senate Bill 1. (STATE166756-772).	July 28, 2023	

302	Transcript of Texas House of Representatives Session (Part II), August 27, 2021, Re: Senate Bill 1. (STATE167151-54).	July 28, 2023	
303	Transcript of Texas Senate Session, August 27, 2021, Re: Senate Bill 1. (STATE167176-179).	July 28, 2023	
304	Transcript of Texas House of Representatives Session, August 31, 2021, Re: Senate Bill 1. (STATE167201-07).	July 28, 2023	
305	Transcript of Texas Senate Session, August 31, 2021, Re: Senate Bill 1. (STATE167300-328).	July 28, 2023	
306	CONFIDENTIAL 2022 P22 App Rejections (Includes Voters that Cured Rej).xlsx (064.127324)	July 28, 2023	
307	Summary Exhibit - ABBM application and ballot numbers-20220325T005810Z-001.zip?ABBM application and ballot numbers\a_reqexpPM22_full.txt (LUPE_0007719)	July 28, 2023	
308	ABBM application and ballot numbers - 20220325T005810Z-001.zip?ABBM application and ballot numbers\a_reqexpPM22_full.txt (LUPE_0007719)	July 28, 2023	
309	Summary Exhibit - REDACTED_-_P322__1_Dallas.xlsx (LUPE_0007734)	July 28, 2023	
310	REDACTED_-_P322__1_Dallas.xlsx (LUPE_0007734)	July 28, 2023	
311	Summary Exhibit - a_reqexpPM22_full.txt (LUPE_0024430)	July 28, 2023	
312	a_reqexpPM22_full.txt (LUPE_0024430)	July 28, 2023	
313	Summary Exhibit - P322_Election.xlsx (HJ_0008945)	July 28, 2023	
314	P322_Election.xlsx (HJ_0008945)	July 28, 2023	
315	January 31, 2017, Letter on Results of Audit of November 8, 2016, General Election from Gretchen Nagy, Director, Travis County Voter Registration to Michael Winn, Director, Travis County Clerk Elections Division (383.001691)	July 28, 2023	

Date: July 28, 2023

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CERTIFICATE OF SERVICE

I certify that a true and accurate copy of the foregoing document was filed electronically (via CM/ECF) on July 28, 2023, and that all counsel of record were served by CM/ECF.

/s/ Kathleen t. Hunker
KATHLEEN T. HUNKER